

**EXHIBIT A**

For this notice, the Instructions and Definitions included in NCO's First Set of Interrogatories and Requests for Production of Documents, propounded upon Valerie Hue are to be used. In conformity with Fed. R. Civ. P. 30 (b)(5), NCO further requests that Ms. Hue produce, at or before the taking of her deposition, the following:

**REQUEST FOR PRODUCTION NUMBER 1:**

Please produce a copy of your driver's license.

**REQUEST FOR PRODUCTION NUMBER 2:**

Please produce all medical or mental health records pertaining to the physical, medical, or mental conditions, illnesses, stresses, injuries, limitations, or disabilities alleged in your Complaint, including all memoranda, logs, statements, bills, diagnostic or treatment reports, summaries, invoices, writings, notes, or other related documents.

**REQUEST FOR PRODUCTION NUMBER 3:**

Please produce all documents pertaining to any losses you allegedly suffered as a result of any conduct by NCO or its employees.

**REQUEST FOR PRODUCTION NUMBER 4:**

Please produce your state and federal tax returns for the last three years.

**REQUEST FOR PRODUCTION NUMBER 5:**

Please produce all documents or exhibits that you may introduce at the trial of this matter.

**REQUEST FOR PRODUCTION NUMBER 6:**

Please produce all calendars, diaries, notes, logs, journals, e-mails, letters, or other written or recorded summary of events, maintained by you pertaining to the allegations in your Complaint.

REQUEST FOR PRODUCTION NUMBER 7:

Please produce all written or recorded statements or taped conversations, pertaining in any way to this case.

REQUEST FOR PRODUCTION NUMBER 8:

Please produce any and all statements or summaries submitted by plaintiff to any third parties, or given to plaintiff by a third party, relating to the allegations contained in plaintiff's Complaint.

REQUEST FOR PRODUCTION NUMBER 9:

Please produce all documents that you referred to, relied upon, identified in, or otherwise used in answering or responding to this discovery.

REQUEST FOR PRODUCTION NUMBER 10:

Please produce any and all documents that support the allegations in ¶ 16 of plaintiff's Complaint that "Defendant's management made racially charged comments, including one regarding the number of black employees at the Dover, Delaware office (many of whom were hired by Plaintiff) to the effect that the office 'looks like a Tarzan movie' "

REQUEST FOR PRODUCTION NUMBER 11:

Please produce any and all documents that support the allegations in ¶ 20 of plaintiff's Complaint that "Plaintiff at all relevant times followed the Defendant's procedures, policies and practices as they pertained to the re-depositing of payments."

REQUEST FOR PRODUCTION NUMBER 12:

Please produce any and all documents that support the allegations in ¶ 21 of plaintiff's Complaint that "Plaintiff followed the procedures, policies and practices dictated by her supervisor, and did so with her supervisor's knowledge, but subsequently allegedly was discharged for

following those practices. In fact she was discharged because of her race and sex, and because she complained about racial harassment ”

REQUEST FOR PRODUCTION NUMBER 13:

Please produce any and all documents that support the allegations in ¶ 22 of plaintiff's Complaint that “Other General Managers holding the same position as Plaintiff, who were white males, followed the same procedures, policies and practices utilized by Plaintiff for which she was allegedly discharged, but were not themselves discharged ”

REQUEST FOR PRODUCTION NUMBER 14:

Please produce any and all documents that support the allegations in ¶ 23 of plaintiff's Complaint that “Defendant's management also knowingly tolerated and even engaged in racially and sexually offensive and demeaning language and behavior, some of which was directed at Plaintiff ”

REQUEST FOR PRODUCTION NUMBER 15:

Please produce any and all documents that support the allegations in ¶ 26 of plaintiff's Complaint that “Mr. Savage is or was the friend and mentor of Mr. Theodore Fox ”

REQUEST FOR PRODUCTION NUMBER 16:

Please produce any and all documents that support the allegations in ¶ 29 of plaintiff's Complaint that “Plaintiff's job performance was better than the performance of at least some of the other General Managers in the same position held by her, and the employment of those General Managers was not terminated ”

REQUEST FOR PRODUCTION NUMBER 17:

Please produce any and all documents that support the allegations that plaintiff was retaliated against for opposing unlawful race discrimination, gender discrimination, and sexual harassment.

REQUEST FOR PRODUCTION NUMBER 18:

Please produce any and all documents that support the claim for damages in plaintiff's Complaint.

REQUEST FOR PRODUCTION NUMBER 19:

Please produce any and all documents given to or received from plaintiff evidencing discrimination or sexual harassment while employed with NCO.

REQUEST FOR PRODUCTION NUMBER 19:

Please produce any and all documents or materials evidencing any pay or compensation received by plaintiff after plaintiff's separation from employment with NCO.

REQUEST FOR PRODUCTION NUMBER 20:

Please produce any and all documents related to plaintiff's applications for employment after plaintiff's separation from employment with NCO.